

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF AGENDA FOR MATTERS SCHEDULED
FOR HEARING ON JUNE 27, 2018 AT 10:00 A.M.**

CONTESTED MATTERS

1. **08-01789; SIPC v. BLMIS**

- A. Motion and Supporting Memorandum of Law for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 2/23/2018) [ECF No. 17284]

Objections Due: April 11, 2018

Objections Filed:

- B. Declaration In Opposition to the Trustee's Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS (Filed: 4/11/2018) [ECF No. 17466]
- C. Memorandum of Law In Opposition to the Trustee's Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS filed by Andrew J. Goodman on behalf of L.H. Rich Companies (Filed: 4/11/2018) [ECF No. 17467]
- D. Good Faith Defendants' Consolidated Opposition to the Trustee's Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS on behalf of certain Good Faith Defendants filed by Richard A. Kirby on behalf of Lanx BM Investments LLC (Filed: 4/11/2018) [ECF No. 17469]
- E. Opposition to Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Alleged Ponzi Scheme at BLMIS filed by Andrew B. Kratenstein on behalf of Malcolm H. Sage, Sage Associates, Ann M. Sage Passer, in her Capacity as Partner or Joint Venturer of Sage Associates and individually as Beneficiary of Sage Associates,, Ann M. Sage Passer, in her capacity as partner or joint venturer of Sage Realty and individually as beneficiary of Sage Realty, Sage Realty, Martin A. Sage, in his Capacity as Partner or Joint Venturer of Sage Associates and individually as Beneficiary of Sage Associates; and, Martin A. Sage, in his capacity as partner or joint venturer of Sage Realty and individually as beneficiary of Sage Realty (Filed: 4/11/2018) [ECF No. 17470]
- F. Limited Objection of Legacy Capital Ltd. To the Trustees Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining The Existence, Duration, and Scope of the Ponzi Scheme at BLMIS filed by Nicholas F. Kajon on behalf of Legacy Capital, Ltd. (Filed: 4/11/2018) [ECF No. 17471]
- G. Zraick Defendants' Objection to Trustee's Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Alleged Ponzi Scheme (Adv. Pro. 10-05257) filed by Robert A. Rich on behalf of Patricia DeLuca, Karen M. Rich, Nancy Zraick, Edward A. Zraick, Jr. (Filed: 4/11/2018) [ECF No. 17472]
- H. Joinder to Good Faith Defendants' Consolidated Opposition to the Trustee's Motion to Establish an Omnibus Proceeding to Determine the Extent, Duration, and Scope of the Alleged Ponzi Scheme at BLMIS (Filed: 4/11/2018) [ECF No. 17473]

- I. Defendants' Memorandum of Law in Opposition to Trustee's Motion for an Order Establishing an Omnibus Proceeding to Determine the Existence, Duration, and Scope of the Alleged Ponzi Scheme at BLMIS filed by Helen Davis Chaitman on behalf of Edythe Gladstein (Filed: 4/11/2018) [ECF No. 17474]

Declaration of Helen Davis Chaitman in Support of Defendants' Memorandum of Law in Opposition to Trustee's Motion for an Order Establishing an Omnibus Proceeding to Determine the Existence, Duration, and Scope of the Alleged Ponzi Scheme at BLMIS (Filed: 4/11/2018) [ECF No. 17474-1]

Related Filings:

- J. Notice of Adjournment on the Trustee's Motion and Supporting Memorandum of Law for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 2/28/2018) [ECF No. 17289]
- K. Letter to Judge Bernstein regarding the Trustee's Request for Extension and Adjournment of Hearing on Omnibus Ponzi Proceeding filed by Stacey Ann Bell on behalf of Irving H. Picard (Filed: 4/12/2018) [ECF No. 17477]
- L. Notice of Adjournment of Hearing on the Trustee's Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS filed by Stacey Ann Bell on behalf of Irving H. Picard (Filed: 4/13/2018) [ECF No. 17480]
- M. Letter to Judge Bernstein regarding the Trustee's Request for Extension and Adjournment of Hearing on Omnibus Ponzi Proceeding filed by Stacey Ann Bell on behalf of Irving H. Picard (Filed: 5/18/2018) [ECF No. 17593]
- N. Notice of Adjournment of Hearing on Trustee's Motion and Supporting Memorandum of Law for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS filed by Stacey Ann Bell on behalf of Irving H. Picard (Filed: 5/21/2018) [ECF No. 17596]
- O. Letter to Judge Bernstein regarding the Trustee's Request for Extension and Adjournment of Hearing on Omnibus Ponzi Proceeding filed by Stacey Ann Bell on behalf of Irving H. Picard (Filed: 6/13/2018) [ECF No. 17666]
- P. Notice of Withdrawal of Opposition filed by Andrew J. Goodman on behalf of L.H. Rich Companies, M.R. Investment Associates, N.R. Investment Associates (Filed: 5/25/2018) [Adv. Pro. No. 10-05371; ECF No. 36]

Status: This matter is going forward as a status conference.

2. 08-01789; SIPC v. BLMIS

- A. Trustee's Twelfth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 2/14/2018) [ECF No. 17237]
- B. Declaration of Vineet Sehgal in Support of the Trustee's Twelfth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 2/14/2018) [ECF No. 17238]
- C. Notice of Hearing on Trustee's Twelfth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity filed by David J. Sheehan on behalf of Irving H. Picard with hearing to be held on 3/28/2018 at 10:00 AM at Courtroom 723 (SMB) (Filed: 2/14/2018) [ECF No. 17239]

Objections Due: June 1, 2018

Objections Filed:

- D. Opposition to Trustee's Twelfth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity filed on behalf of Peter Moskowitz (Filed: 6/1/2018) [ECF No. 17636]

Reply Filed:

- E. Trustee's Reply to the Objection of Peter Moskowitz to the Trustee's Twelfth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 6/20/2018) [ECF No. 17709]
- F. Declaration of Vineet Sehgal in support of the Trustee's Reply to the Objection of Peter Moskowitz to the Trustee's Twelfth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 6/20/2018) [ECF No. 17710]

Related Filings:

- G. Request For An Adjournment And Extension Of Time To File Written Objections Filed by Peter Moskowitz (Filed: 3/14/2018) [ECF No. 17333]
- H. So Ordered Stipulation And Order Signed On 3/20/2018 Re: Adjourning The Hearing And Extending The Objection Deadline On The Trustee's Twelfth Omnibus Motion To Disallow Claims And Overrule Objections Of Claimants

Who Have No Net Equity, Solely With Respect To Peter Moskowitz (Filed: 3/20/2018) [ECF No. 17383]

- I. So Ordered Stipulation And Order Between The Trustee And Peter Moskowitz signed On 4/17/2018 Re: Adjourning The Hearing And Extending The Objection Deadline On The Trustee's Twelfth Omnibus Motion To Disallow Claims And Overrule Objections Of Claimants Who Have No Net Equity, Solely With Respect To Peter Moskowitz (Filed: 4/17/2018) [ECF No. 17492]

Status: This matter is going forward as scheduled.

3. **09-01161; Picard v. Ceretti, et al.**

- A. Letter from Joint Liquidators Requesting the Court's Guidance Regarding a Period of Mediation Following Conclusion of Fact Discovery filed by Robert S. Loigman on behalf of Kingate Euro Fund, Ltd., Kingate Global Fund, Ltd. (Filed: 6/6/2018) [ECF No. 348]
- B. Letter re: June 6, 2018 Letter from Joint Liquidators Requesting the Court's Guidance Regarding a Period of Mediation Following Conclusion of Fact Discovery filed by Geraldine E. Ponto on behalf of Irving H. Picard (Filed: 6/18/2018) [ECF No. 352]

Status: This matter is going forward as a status conference

Dated: June 26, 2018
New York, New York

By: /s/David J. Sheehan
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*